Morton *International*

Morton Salt

August 10, 1993

Mr. D. Wayne Hedberg
Permit Supervisor
State of Utah Natural Resources
Oil, Gas & Mining
3 Triad Center, Suite 350
Salt Lake City, UT 84180-1203

RE: Notice of Intent to Conduct Large Mining Operations, Morton International, Inc., Morton Salt Division - Grantsville, M/045/033, Tooele County, Utah

Dear Mr. Hedberg:

Per my letter to you dated March 29, 1993 regarding clarification of your review of the subject Notice of Intent, I indicated a new Stormwater Pollution Prevention Plan would be forwarded to your office prior to the October 1, 1993 State of Utah implementation deadline. A copy of the plan is provided as Enclosure 1 (Stormwater Pollution Prevention Plan - Grantsville Facility) for your review. This submittal is in answer to question "R647-4-107 Operation Practices 107.3 (DWH)" of your April 2, 1992 letter.

If you have any questions please call me at 312/807-2673. Please respond in writing if this submittal is satisfactory.

Sincerely,

Tom Anders

T. D. Anders
Environmental Specialist

TDA/cep/073093

cc: G. C. Price w/o attachments
R. V. Upham w/o attachments

Enclosure 1 - SEE PLAN BINDER FOR MAP ATTACHMENT
Stormwater Pollution Prevention Plan (July 1, 1993) - Grantsville Facility

Morton International, Inc., Morton International Building
100 N. Riverside Plaza, Randolph Street at the River
Chicago, IL 60606-1597 312/807-2000

ENCLOSURE 1
(Morton letter dated August 2, 1993)

STORMWATER POLLUTION PREVENTION PLAN
GRANTSVILLE FACILITY

INTERSTATE 80 EXIT #84
P. O. BOX 506
GRANTSVILLE, UTAH 84029
(801) 250-6335

EMERGENCY CONTACTS: Gary C. Price, Facility Manager 882-5374
SECONDARY CONTACTS: Lloyd Godfrey, Environmental Coord. 298-2787
Scott Farrell, Maint. Superintendent 964-9544

TYPE OF MANUFACTURING: Solar Salt Production
OPERATING SCHEDULE: 3 Shifts Around the Clock
NUMBER OF EMPLOYEES: 84

STORMWATER PERMIT #UTR000080

CERTIFICATION OF PLAN:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Signed: _____
Gary C. Price
Facility Manager

Approved 1 July 93

GRANTSVILLE FACILITY SITE ASSESSMENT

POSSIBLE STORMWATER POLLUTANT AREAS:

The fueling station, should a containment wall fail.

EXISTING MANAGEMENT PRACTICES:
The fueling area is contained in accordance with SPCC plan.

SUMMARY OF POLLUTANT SOURCES:
Based on site assessment of 5-20-93, pollution would occur only if large amounts of rain would fall causing the level of water in the canal to overflow its banks. Our rainfall amounts are historically very low and we do not anticipate a problem.

GRANTSVILLE FACILITY
STORMWATER POLLUTION PREVENTION PLAN

A. Stormwater falling on the asphalt area which surrounds the mill, drains to the east and north.

1. The south and east areas drain to the east going underground at the south west corner of the maintenance building, and surfacing again at the south east corner. From that point, a ditch carries it to the south canal which flows east to join a north canal near the stormwater control gate.

2. Areas to the north and west of the mill drain north a very short distance entering the north canal which travels east and parallels the south canal.

3. A ditch just north of the east end of the maintenance building will collect wash water as mud and salt is washed from equipment. This ditch will enter the afore mentioned south canal at the canal's beginning.

Where these two canals join (map) a separating mechanism is in place which will separate water from petroleum or lighter than water liquids.

B. Water returning through our drainage system will drop most of the sediment because of the essentially flat grade and then enter the canal which flows to the Great Salt Lake. Chemical analysis (in accordance with UPDES authorized permit) indicates water from the lake and water to the lake carry the same constituents.

C. Normally any spills will be retained:

1. In the storm water control gate east of facility (map).

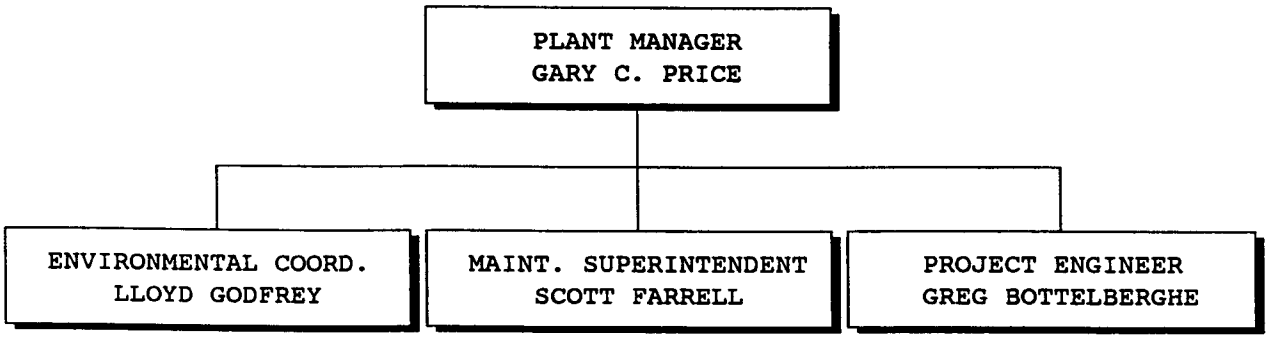
2. In the fuel area by concrete retaining walls.

3. In oil storage by concrete retaining walls.

Should the storm be so sudden or extensive to be retained as stated, then the separating station will allow containment until removal is accomplished.

Moisture accumulations in this desert climate is less than 10" per year. Therefore, any one storm does not cause a problem.

GRANTSVILLE FACILITY
POLLUTION PREVENTION TEAM
ORGANIZATION CHART



POLLUTION PREV. ION TEAM

MEMBER ROSTER

Worksheet
Completed by: L. M. Godfrey
Title: Environmental Coordinator
Date: May 20, 1993

Leader: Gary C. Price **Title:** Facility Manager
Office Phone: (801) 250-6335

Responsibilities:
Authorized signature for reports.
Coordinates plan development and implementation.

Members:

(1) L. M. Godfrey **Title:** Environmental Coordinator
Office Phone: (801) 250-6335

Responsibilities:
Designs, develop and implement PPP, coordinate employee training, retains all records and ensures reports are submitted, oversees and schedules inspections.

(2) J. Scott Farrell **Title:** Maintenance Supervisor
Office Phone: (801) 250-6335

Responsibilities:
Spill response coordinator responsible for good housekeeping of all areas and preventive maintenance program.

(3) Greg Bottelberghe **Title:** Project Engineer
Office Phone: (801) 250-6335

Responsibilities:
Oversees inspections, backup spill response coordinator.

(4) _____ **Title:** _____
Office Phone: _____

Responsibilities:

DEVELOPING A SITE MAP

Worksheet #2
Completed by: L. M. Godfrey
Title: Environmental Coordinator
Date: May 20, 1993

Instructions: Draw a map of your site including a footprint of all buildings, structures, paved areas, and parking lots. The information below describes additional elements required by EPA's General Permit.

EPA's General Permit requires that you indicate the following features on your site map:

- All outfalls and storm water discharges
- Drainage areas of each storm water outfall
- Structural storm water pollution control measures, such as:
  - Flow diversion structures
  - Retention/detention ponds
  - Vegetative swales
  - Sediment traps
- Name of receiving waters (or if through a Municipal Separate Storm Sewer System)
- Locations of exposed significant materials
- Locations of past spills and leaks
- Locations of high-risk, waste-generating areas and activities common on industrial sites such as:
  - ✓ Fueling stations
  - ✓ Vehicle/equipment washing and maintenance areas
  - ✓ Area for unloading/loading materials
  - ✓ Above-ground tanks for liquid storage
  - Industrial waste management areas (landfills, waste piles, treatment plants, disposal areas)
  - Outside storage areas for raw materials, by-products, and finished products
  - Outside manufacturing areas
  - Other areas of concern (specify:_____)

MATERIAL INVENTORY

Worksheet #3
Completed by: L. M. Godfrey
Title: Environmental Coordinator
Date: May 20, 1993

Instructions: List all materials used, stored, or produced onsite. Assess and evaluate these materials for their potential to contribute pollutants to storm water runoff. Also complete Worksheet 3A if the material has been exposed during the last 3 years.

Material	Purpose/Location	Quantity (units)			Quantity Exposed in Last 3 Years	Likelihood of contact with storm water. If yes, describe season.	Past Significant Spill or Leak	
		Used	Purchased	Stored			Yes	No
Salt	Uncovered bulk storage piles				Yes All	Yes there's contact with storm water uncovered and exposed to elements. Drainage is into the Great Salt Lake, as authorized by UPDES Permit.		X
Fuels:								
Diesel	Above ground				No	Containment wall will hold		x
Unleaded	storage				No	all contents of tanks plus		x
Gas	tanks					stormwater		

DESCRIPTION OF EXPOSED SIGNIFICANT MATERIAL

Worksheet #3A
Completed by: N/A
Title: _____
Date: _____

Instructions: Based on your material inventory, describe the significant materials that were exposed to storm water during the past three years and/or are currently exposed. For the definition of "significant materials" see page 5 of this summary.

Description of Exposed Significant Material	Period of Exposure	Quantity Exposed (units)	Location (as indicated on the site map)	Method of Storage or Disposal (e.g., pile, drum, tank)	Description of Material Management Practice (e.g., pile covered, drum sealed)

LIST OF SIGNIFICANT SPILLS AND LEAKS

Worksheet #4
Completed by: L. M. Godfrey
Title: Environmental Coordinator
Date: May 20, 1993

Directions: Record below all significant spills and significant leaks of toxic or hazardous pollutants that have occurred at the facility in the three years prior to the effective date of the permit.

Definitions: Significant spills include, but are not limited to, releases of oil or hazardous substances in excess of reportable quantities.

1st Year Prior: NONE

Date (month/day/year)	Spill	Leak	Location (as indicated on site map)	Description				Response Procedure		Preventive Measures Taken
				Type of Material	Quantity	Source, If Known	Reason	Amount of Material Recovered	Material No Longer Exposed to Storm Water (True/False)	

2nd Year Prior: NONE

Date (month/day/year)	Spill	Leak	Location (as indicated on site map)	Description				Response Procedure		Preventive Measures Taker
				Type of Material	Quantity	Source, If Known	Reason	Amount of Material Recovered	Material No Longer Exposed to Storm Water (True/False)	

3rd Year Prior: NONE

Date (month/day/year)	Spill	Leak	Location (as indicated on site map)	Description				Response Procedure		Preventive Measures Taken
				Type of Material	Quantity	Source, If Known	Reason	Amount of Material Recovered	Material No Longer Exposed to Storm Water (True/False)	

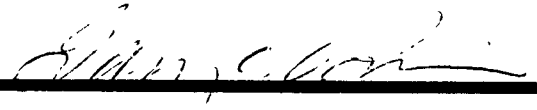
NON-STORM WATER DISCHARGE ASSESSMENT AND CERTIFICATION

Worksheet #5
Completed by: L. M. Godfrey
Title: Environmental Coordinator
Date: May 20, 1993

Date of Test or Evaluation	Outfall Directly Observed During the Test (identify as indicated on the site map)	Method Used to Test or Evaluate Discharge	Describe Results from Test for the Presence of Non-Storm Water Discharge	Identify Potential Significant Sources	Name of Person Who Conducted the Test or Evaluation
	ALL NON-STORM WATER DISCHARGES		ARE COVERED UNDER UPDES	PERMIT UT0000388	

CERTIFICATION

I, Gary C. Price (responsible corporate official), certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A. Name & Official Title (type or print)	B. Area Code and Telephone No.
Gary C. Price, Facility Manager	801/250-6335
C. Signature 	D. Date Signed July 20, 1993

MEASURES AND CONTROLS

BMP	BRIEF DESCRIPTION OF ACTIVITIES:
GOOD HOUSEKEEPING:	Collect and recycle used oil; continue regular trash pick-up; continue sweeper and scrubber operation of parking lot.
PREVENTIVE MAINTENANCE:	Continue daily inspections of facility including canals, parking lot and drains.
INSPECTIONS:	Continue daily inspections with monthly plant and safety inspections including housekeeping.
SPILL PREVENTION RESPONSE:	Follow SPCC plan and continue monthly assessments.

POLLUTANT SOURCE IDENTIFICATION
(Section 2.2.6)

Worksheet #7
Completed by: L. M. GODFREY
Title: Environmental Coordinator
Date: July 1, 1993

Instructions: List all identified storm water pollutant sources and describe existing management practices that address those sources. In the third column, list BMP options that can be incorporated into the plan to address remaining sources of pollutants.

Storm Water Pollutant Sources	Existing Management Practices	Description of New BMP Options
1. Oil From Storage Area (Inside)	Sufficient high walls to contain total volume.	
2. Fuels (Above Ground-Outside)	Containment walls for combined volume.	
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		

BMP IDENTIFICATION
(Section 2.3.1)

Worksheet #7a
Completed by: L. M. GODFRFY
Title: Fnvironmental Coordinator
Date: July 1, 1993

Instructions: Describe the Best Management Practices that you have selected to include in your plan. For each of the baseline BMPs, describe actions that will be incorporated into facility operations. Also describe any additional BMPs (activity-specific (Chapter 3) and site-specific BMPs (Chapter 4)) that you have selected. Attach additional sheets if necessary.

BMPs	Brief Description of Activities
Good Housekeeping	Team members will inform managers of areas needing attention.
Preventive Maintenance	Equipment standing on drainage areas and other equipment will be checked for leakage.
Inspections	Team members will inspect all facets of drainage system weekly and file a report monthly.
Spill Prevention Response	Team members will train all foremen and key personnel of spill procedures.
Sediment and Erosion Control	The near level terrain usually controls, but team member will look for evidence.
Management of Runoff	Should contamination occur a shutoff will contain flow until cleanup is complete.
Additional BMPs (Activity-specific and Site-specific)	

IMPLEMENTATION
(Section 2.4.1)

Worksheet #8
Completed by: L. M. GODFREY
Title: Environmental coordinator
Date: July 1, 1993

Instructions: Develop a schedule for implementing each BMP. Provide a brief description of each BMP, the steps necessary to implement the BMP (i.e., any construction or design), the schedule for completing those steps (list dates) and the person(s) responsible for implementation.

BMPs	Description of Action(s) Required for Implementation	Scheduled Completion Date(s) for Req'd. Action	Person Responsible for Action	Notes
Good Housekeeping	1. Produce list & items to check.	Sept. 15	L. Godfrey	
	2. Assign for responsibilities	Sept. 15	G. Price	
	3. Review Areas of Concern	Sept. 15	S. Farrell	
Preventive Maintenance	1. Assign Equipment Maintenance	Sept. 15	S. Farrell	
	2. Approve Maintenance Items	Sept. 15	G. Price	
	3.			
Inspections	1. By members of team	Oct. 1	L. Godfrey	
	2. In Alternating Months			
	3.			
Spill Prevention and Response	1. Team members will set policy and	Oct. 15	L. Godfrey	
	2. response by foreman			
	3.			
Sediment and Erosion Control	1. Not likely due to grade, but team	Oct. 15	L. Godfrey	
	2. members will make monthly inspections			
	3.			
Management of Runoff	1. Team Members	Oct. 15	L. Godfrey	
	2. Written Instructions			
	3.			
Additional BMPs (Actively-specific and site-specific)	1.			
	2.			
	3.			

EMPLOYEE TRAINING
(Section 2.4.2)

Worksheet #9
Completed by: L. M. GODFREY
Title: Environmental Coordinator
Date: July 1, 1993

Instructions: **Describe the employee training program for your facility below. The program should, at a minimum, address spill prevention and response, good housekeeping, and material management practices. Provide a schedule for the training program and list the employees who attend training sessions.**

Training Topics	Brief Description of Training Program/Materials (e.g., film, newsletter course)	Schedule for Training (list dates)	Attendees
Spill Prevention and Response	Team members will direct drainage intricies & instruct with maps.	November 1, 1993	Managers and Foreman
Good Housekeeping	Team members will instruct all employees	November 1, 1993	Managers and Foreman
Material Management Practices	Mill Superintendent along with team members instruct	November 15, 1993	Team Members Foreman
Other Topics			